

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

In re: JAMES EARL COSTON)	
<u>Debtor(s)</u>)	
)	CHAPTER 13
WELLS FARGO BANK, N.A.)	
d/b/a WELLS FARGO DEALER SERVICES)	Case No.: 16-17926 (JKF)
<u>Moving Party</u>)	
)	Hearing Date: 7-12-17 at 9:30 AM
v.)	
)	11 U.S.C. 362
JAMES EARL COSTON)	
<u>Respondent(s)</u>)	
)	
WILLIAM C. MILLER)	
<u>Trustee</u>)	

REQUESTS FOR PRODUCTION OF DOCUMENTS

Pursuant to Bankruptcy Rule 7034 and F.R.Civ. P.34, Movant hereby requests the respondent/debtor to produce any and all documents requested herein, for purposes of inspection and copying or, in lieu thereof, to produce those same documents, or true and legible copies, by mail or other similarly reliable means to the law offices of Morton & Craig LLC for purposes of inspection and copying.

1. If you deny any or all of the subsections under Movant's Request For Admissions, please produce any and all copies of payments, proof of payments, or any other documentation evidencing that payments were made to Movant for the payments due to Wells Fargo for the months of November 2016, through May 2017, including but not limited to canceled checks, receipts, proof of money orders and copies of bank account statements.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Movant's Request For Admissions.

Respectfully submitted:

/s/ William E. Craig

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Local Counsel for Wells Fargo Bank, N.A. d/b/a Wells Fargo Dealer Services